

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:18-CR-282-1B0(1)

UNITED STATES OF AMERICA                    )  
  )  
          v.                                    ) INDICTMENT  
  )  
FRANKIE LEE JONES                            )

The Grand Jury charges that:

COUNT ONE

On or about January 28, 2017, in the Eastern District of North Carolina, the defendant, FRANKIE LEE JONES, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. These visual depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce; all in violation of Title 18, United States Code Sections 2251(a) and (e).

COUNT TWO

On or about January 28, 2017, at a time separate and apart from the conduct constituting Count One of this Indictment, in the Eastern District of North Carolina, the defendant, FRANKIE LEE JONES, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. These visual depictions were produced using materials that had been

mailed, shipped, and transported in interstate and foreign commerce; all in violation of Title 18, United States Code Sections 2251(a) and (e).

### COUNT THREE

On or about February 9, 2017, in the Eastern District of North Carolina, the defendant, FRANKIE LEE JONES, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. These visual depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce; all in violation of Title 18, United States Code Sections 2251(a) and (e).

### COUNT FOUR

On or about February 9, 2017, at a time separate and apart from the conduct constituting Count Three of this Indictment, in the Eastern District of North Carolina, the defendant, FRANKIE LEE JONES, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. These visual depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce; all in violation of Title 18, United States Code Sections 2251(a) and (e).

COUNT FIVE

On or about February 19, 2017, in the Eastern District of North Carolina, the defendant, FRANKIE LEE JONES, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. These visual depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce; all in violation of Title 18, United States Code Sections 2251(a) and (e).

COUNT SIX

*Beginning on or about January 22, 2017, and continuing to*

*BUD ECB*

On or about March 3, 2017, in the Eastern District of North Carolina, the defendant, FRANKIE LEE JONES, using any facility of interstate and foreign commerce, did knowingly persuade, induce, entice, and coerce any individual who had not attained the age of 18 year to engage in any sexual activity for which any person can be charged with a criminal offense, specifically Statutory Sexual Offense with a Person Who Is 15 Years of Age or Younger, in violation of N.C. Gen. Stat. § 14-27.30(a), and Taking Indecent Liberties with Children, in violation of N.C. Gen. Stat. §§ 14-202.1, all in violation of Title 18, United States Code, Section 2422(b).

FORFEITURE

If convicted of one or more of the offenses set forth in Counts One through Five above, the defendant, FRANKIE LEE JONES,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), all his right, title, and interest in:

(1) any visual depiction described in 18 U.S.C. § 2251 or 2252, or book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of the offenses;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property.

If convicted of one or more of the offenses set forth in Count Six above, the defendant, FRANKIE LEE JONES, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a), all his right, title, and interest in any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property; and any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses.

If any of the property described above, as a result of any

act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

**REDACTED VERSION**

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

Date: 7/25/18

ROBERT J. HIGDON, JR.  
United States Attorney

Erin C. Blondel  
ERIN C. BLONDEL

Assistant United States Attorney